

# Title I, Part A Basics

For New Program Coordinators



# Topics

- Purpose of Title I
- Allocations
- Applying for funds
- Fiscal responsibilities
- Program requirements
- Monitoring



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# Program Purpose

## Purpose

- Title I, Part A (Improving Basic Programs) is one of the largest federal program supporting elementary and secondary education. These supplemental resources help ensure that:
  - All children have a fair, equal and significant opportunity to obtain a high-quality education;
  - Support and resources are provided to achieve proficiency on challenging state academic achievement standards and assessments;
  - Resources are targeted to districts and schools in the greatest need.



# School-Based Program

- Title I, Part A is meant to be a school-based program so schools can make decisions about what services will most influence student outcomes.
- Consultation between the district and its schools is required during the development of the GMAP application and the implementation and evaluation of the program.



#### Title I Coordinator Roles

- Oversight of entire program:
  - Ongoing consultation with public and private/home schools
  - Program implementation management and evaluation at district and public and private schools
  - Compliance with federal statutes and regulations (allowability of costs, parent and family engagement, stakeholder collaboration, etc.)
  - Internal collaboration (finance staff, homeless coordinator, principals, superintendent, etc.)



# Stop and Think

- Who do you collaborate with?
- How often?
- What topics are addressed?
- What methods (committees, councils, meetings, etc.)?
- **Be** prepared to share.





## Allocations

# **Funding Sources**

- Title I-A allocations consist of 4 different grants, each with separate eligibility criteria. Note: A "formula child" is between the ages of 5 and 17 living in poverty.
  - Basic Grants: The number of formula children must be at least 10 and more than 2% of the total number of children aged 5-17.
  - Concentration Grants: The number of formula children within the district must exceed either 6,500 or 15% of the total number of children aged 5 through 17. To qualify for this funding source, an LEA must meet the eligibility criteria in the current year or have met the criteria at least once in the four years prior to the current year. Because falling out of eligibility for this funding source can greatly affect your total allocation, KDE will contact you if this applies.
  - Targeted Grants: The number of formula children must be at least 10 and at least 5% of the total number of children aged 5 through 17.
  - Education Finance Incentive Grants: The number of formula children must be at least 10 and at least 5% of the total number of children aged 5 through 17.



# **Determining Allocations**

- Using Census Bureau estimates of children aged 5-17 and 5-17 in poverty, the USED determines base allocations.
- Base allocations are ratably reduced to make up the state's administration and school improvement funds.
- No district is reduced below its hold harmless level.



#### **Hold Harmless**

- The "rock bottom" dollar amount a district may receive in any fiscal year
- Variable
- Based on last year's allocation:
  - 95% if the Census poverty percentage is 30% or greater;
  - 90% if the Census poverty percentage is between 15% and 30%; or
  - 85% if the Census poverty percentage is below 15%.



#### Allocation Timeline

- Spring: Tentative allocations are released. At this point, not all Census data is final. A tentative GMAP application is completed.
- Late/Spring Early Summer: A "final" allocation with updated Census data is released. KDE calculates allocations, but does not release to districts at this point, unless there are major changes.
- First Part of October: The "real final" is released. KDE calculates and issues this final to districts. GMAP revisions are required.



# Stop and Think

- A district's current allocation is \$1,000,000. It qualifies for all the funding sources for the Title I allocation. KDE issues tentative Census numbers the following winter, which states the district's poverty percentage is 31%.
  - What will the district's hold harmless percentage and rock bottom allocation be for the next year?
  - How would you use this information in your district?





# Applying for Funds

## Application for Funds

- **GMAP**
- LEAs apply for Title I, Part A; Title I, Part D; Title II, Part A; Title III English Learners; Title III Immigrant; Title IV, Part A; and Title V Rural and Low Income in a consolidated application.
- CTE and IDEA are separate applications in the system.



#### District Set-Asides

- Mandatory Set-Asides
  - Homeless: Must be enough to provide comparable supplemental services to homeless students.
  - Neglected Institutions: Must be enough to provide comparable services to those students in local neglected facilities if the district serves a facility.
  - Parent and Family Engagement: For districts with allocations of at least \$500,000. Must set aside at least 1% of the allocation for this purpose, including funds transferred into Title I.



# Stop and Think

- How do you use the homeless set-aside to provide supplemental services to homeless students?
- Who do you collaborate with to ensure the set-aside is spent in the fiscal year for which it is reserved?
- **Be** prepared to share.



#### District Set-Asides

- Other set-asides categories are optional.
- KDE issued <u>set-aside guidance</u>, providing expectations and guiding questions pertaining to the reservation and use of optional set-asides.
  - Title I is intended to be a school-based program.
  - Potential risks with circumventing rank order and school council authority.



# Ranking and Serving Schools

- LEAs have the discretion to choose which poverty factors are used to rank and serve schools and distribute funds.
  - Free and reduced lunch
  - Free meals
  - TANF
  - Medicaid
  - US Census
  - Community Eligibility Provision (CEP)
- Must use the same poverty factor for all schools within the district
  - Exception for districts participating in CEP



# Rank Order and School Eligibility

- Attendance area or school enrollment is used to determine rank order.
- Schools must be served in rank order by poverty percentage:
  - Schools with a higher poverty rate must be served with an equal or greater per-pupil allocation.
  - All schools above 75% must be served first in rank order.
  - Below 75% LEAs may serve in rank order within grade spans (Grade Span Grouping).
  - An LEA may choose to serve elementary schools at a higher amount than secondary schools.



# Rank Order and School Eligibility

- ▶ 35% Rule: Any school at or above 35% poverty is eligible to receive an allocation.
- District Poverty Average: Any school at or above the district's poverty average is eligible to receive an allocation
- Grade Span Poverty Average: Any school at or above the grade span poverty average is eligible to receive an allocation.



# Rank Order and School Eligibility



#### Special Rule

- If an LEA serves any school with a poverty rate below 35%, the LEA must allocate to all of its schools a per-pupil amount at least 125% of the LEA's allocation per low-income child.
- In this case, the minimum PPA will be automatically calculated on the PPA List page in GMAP.

#### Rank and Serve

- ► Elementary School A = 79%
- ► Elementary School B = 65%
- High School A = 62%
- Middle School A = 60%
- ► Elementary School C = 57%



# Grade Span Ranking

- **Elementary School A = 79% (\$900 PPA)**
- Elementary School B = 65% (\$900 PPA)
- High School A = 62% (\$0 PPA)
- Middle School A = 60% (\$0 PPA)
- ► Elementary School C = 57% (\$750 PPA)



# Districtwide Ranking

- Elementary School A = 79% (\$600 PPA)
- **Elementary School B = 65% (\$600 PPA)**
- High School A = 62% (\$533 PPA)
- Middle School A = 60% (\$515 PPA)
- ► Elementary School C = 57% (\$450 PPA)



# GMAP and MUNIS Alignment

- GMAP and MUNIS must align.
- Preplanning and collaboration with finance up front reduces burden.
- Statute and regulation:
  - Grantees must follow their approved application
  - Ensures allowable activities defined in approved plan
  - Ensures rank and serve rules are followed
  - Ensures compliance with all other requirements



#### **GMAP** Revisions

- Application revisions may be made at any point during the year through the GMAP system. An application revision would be required when:
  - Funds are reallocated;
  - A district moves Title I, Part A funds, which causes a change in the amount of a district set-aside;
  - A district moves Title I, Part A funds, which causes a change in the amount of a school allocation;
  - A district makes significant changes in the types of Title I, Part A
    activities it will carry out (for example, if a district was originally
    approved to carry out professional learning activities but desires to
    change that to parent and family engagement activities); or
  - There is misalignment between GMAP and MUNIS. It is highly recommended that districts develop a process to regularly align GMAP and MUNIS.





# District Fiscal Responsibilities

## **Carryover Limitation**

- Title I has a 15 % carryover limitation.
- Districts can carry over no more than 15% of a fiscal year's allocation into the next.
  - Have an initial period of 15 months to meet the limitation.
  - 2020-2021: July 1, 2020, to Sept. 30, 2021.
  - May request a carryover waiver once every 3 years.



### **CARES Act Waiver**

The CARES Act provides funding flexibilities to support continued learning for Title I, Part A through:

- Providing a period of availability extension for school year 2018-2019 funds (Project E) through Sept. 30, 2021; and
- Providing a relief from the 15% carryover limitation requirements for the 2019-2020 funds (Project F), effectively allowing districts to request a carryover limitation waiver more than once in a three-year period.



## Stop and Think

- Do you have processes in place to ensure your carryover limitation is met within the first 15 months of a grant cycle?
- Who does it involve?
- What steps are taken?
- **Be** prepared to share.



## Comparability

- Districts must prove that services funded through state and local funds are comparable in all its schools.
- Comparability Report
  - Comparison of student/staff ratios or school-toschool salary comparisons.
  - Accounts for staff paid from state/local dollars.



## Supplement, Not Supplant

- Title I funds must be used to supplement funds that would be available from state and local sources, absent federal funds.
- Compliance
  - SNS methodology
  - Methodology must show the district distributes state/local dollars and services to all schools in a Title I-neutral fashion.



# Supplement, Not Supplant

- Methodology Expectations:
  - Must account for distribution of state and local funds (including staff, resources and services such as professional development) in a Title I-neutral manner
  - Include all state and local funds that the district uses for the education of students
  - Must reflect staffing and services allocations with real calculations and numbers to support it
  - Based on the staffing allocation districts already provide to KDE
  - Accompanying narrative to explain
  - Must be supported with documentation (ESEA section 8306(a)(6)(B) and 34 C.F.R. §§76.730-76.731)



### What to Include in the Narrative

- Explain the staffing and funding sources that are included in the district's methodology.
- Explain how funds were distributed. For example, if certain funds are allocated on a rotational basis or are combined and assigned through a per-pupil amount, please explain.
- Explain which year's enrollment is being used in the calculations, if not clearly labeled.
- Affirm how the funds and staff were distributed according to the methodology.



### **Exclusions**

- Issued in USED guidance
- There are exemptions under the following conditions:
  - One school district (the district would be exempt as a whole.);
  - A grade span with a single school (the singleschool grade span would be exempt); or
  - Serves all schools with Title I allocations (the district would be exempt as a whole if every school is served. If all schools within a grade span are served, that grade span would be exempt).





# Additional Program Requirements

## Title I School Programs

Targeted Assistance	Schoolwide
Services and resources must be targeted only toward students identified as most at-risk.	Services must be designed to help at-risk students but may also include whole school initiatives. The schoolwide plan describes services.
Only eligible students may participate in Title I-funded initiatives.	All students may participate in Title I-funded initiatives.
Use of funds must be consistent with specific Title I.	Use of funds must be consistent with specific Title I rules and schoolwide plan.
Only staff implementing the Title I program may participate in Title I-funded professional learning opportunities.	All school staff are eligible to participate in Title I-funded professional learning opportunities.
The school must implement parent and family engagement compact, policy and requirements for families of participating students.	The school must implement parent and family engagement compact, policy and requirements for all families.



## Parent and Family Engagement

- School and district parent and family engagement activities fall into two general categories:
  - Providing notice and information regarding the education of their children (right to participate, request teacher qualifications and the 4-week notice); and
  - Implementing activities that engage parents and families in the school community and with their children's education.



## Parent and Family Engagement

- All districts and schools that accept funds have required activities that must be conducted with parents. For example, parents and families must:
  - Be consulted on the use of parent and family engagement funds;
  - Be involved in the development of the Title I program;
  - Be involved in the Title I program evaluation (school level);
  - Be involved in the development of the district- and school-level policies and school compacts.



### Stop and Think

- What types of district and school parent and family activities do you provide?
- What parent and family engagement challenges do you face?
- How are you addressing these challenges?
- Be prepared to share.



### **Private Schools Services**

- Title I, Part A has its own equitable services requirements.
- Other programs' equitable services requirements are covered in Title VIII of the ESSA.
- Why?
  - Districts are required by statute to provide equitable services to students, parents and teachers of participating students in private schools within and outside the district's boundaries.
  - Other programs are required to provide services to private schools that are within their boundaries only.



### **Private School Services**

- Services are required to:
  - Be proportionately funded off the top of the district's allocation;
  - Include an amount for parent and family engagement for families of participating students;
  - Target the lowest-achieving students;
  - Be designed and evaluated through ongoing consultation with private schools; and
  - Be fully overseen, both programmatically and fiscally, by the district.



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# **Monitoring Processes**

### Monitoring

- Conduct 10-15 desk-monitoring reviews in the fall; new process for the 2018-2019 school year.
- Each spring, conduct 10-15 on-site visits in conjunction with the consolidated monitoring process.
- Should be seen as technical assistance opportunity.
- Recommendation: Use the Title I, Part A monitoring checklists to evaluate district and school requirements.



## **Monitoring Process**

- District notified a few weeks prior.
- 2. District uploads documentation to an online folder by assigned due date.
- 3. KDE reviews documentation and develops follow-up questions to supplement monitoring checklists.
- 4. KDE follow-up:
  - a. <u>Desk Review:</u> Q&A via email and/or phone with district coordinator.
  - On Site: Q&A with coordinator, finance officer, homeless coordinator, neglected facilities, principals of Title Iserved schools via face-to-face interviews; potential follow-up via email and phone after the visit.



### **Monitoring Process**

- Final step: KDE writes report identifying:
  - Quality practices
  - Recommendations
  - Findings with assigned actions
    - ✓ State the finding
    - √ State the action(s) required
    - **✓** State the due date



## Stop and Think

Before we wrap up, what questions do you have about the Title I, Part A program?



#### **Contact Information**

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